

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,  
ALLISON MACK, KATHY RUSSELL,  
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

No. 18-cr-204 (NGG)

**NOTICE OF MOTION TO SUPPRESS**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated January 9, 2019, the Declaration of Alexandra A.E. Shapiro, dated January 9, 2019, the Declaration of Kathleen E. Cassidy, dated January 9, 2019, and the exhibits appended to these Declarations, Defendant Clare Bronfman moves this Court, before the Honorable Nicholas G. Garaufis, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an Order suppressing the fruits of the searches of her personal email account, and for such further relief as the Court may deem proper.

Dated: January 9, 2019  
New York, New York

Susan Necheles  
Kathleen E. Cassidy  
Hafetz & Necheles LLP  
10 East 40th Street, 48th Floor  
New York, New York 10016  
(212) 997-7400

/s/ Alexandra A.E. Shapiro  
Alexandra A.E. Shapiro  
Fabien M. Thayamballi  
Shapiro Arato LLP  
500 Fifth Avenue, 40th Floor  
New York, New York 10110  
(212) 257-4880

*Attorneys for Defendant Clare Bronfman*